

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JIMMY J. LARS JR.

[DOB: 06/25/1979],

Defendant.

Case No. \_\_\_\_\_

**COUNTS ONE THROUGH FOUR:**

***Possession/Distribution of Marihuana***

21 U.S.C. §§ 841(a)(1) and (b)(1)(D)

NMT: 5 Years Imprisonment

NMT: \$250,000 Fine

NLT: 2 Years Supervised Release

Class D Felony

**COUNT FIVE:**

***Possession of a Firearm in Furtherance of  
Drug Trafficking***

18 U.S.C. § 924(c)(1)(A)

NLT: 5 Years Imprisonment (consecutive)

NMT: Life Imprisonment (consecutive)

NMT: \$250,000 Fine

NMT: 5 Years Supervised Release

Class A Felony

**COUNT SIX:**

***Felon in Possession of a Firearm***

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

\$100 Mandatory Special Assessment

Class C Felony

\$100 Mandatory Special Assessment per  
count of felony conviction

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

On or about May 06, 2019, within the Western District of Missouri, the defendant Jimmy J. Lars Jr., did knowingly and intentionally distribute a mixture or substance containing a

detectable amount of Marihuana, a Schedule I controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

### **COUNT TWO**

On or about May 07, 2019, within the Western District of Missouri, the defendant Jimmy J. Lars Jr., did knowingly and intentionally distribute a mixture or substance containing a detectable amount of Marihuana, a Schedule I controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

### **COUNT THREE**

On or about May 13, 2019, within the Western District of Missouri, the defendant Jimmy J. Lars Jr., did knowingly and intentionally distribute a mixture or substance containing a detectable amount of Marihuana, a Schedule I controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

### **COUNT FOUR**

On or about May 15, 2019, within the Western District of Missouri, the defendant Jimmy J. Lars Jr., did knowingly and intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of Marihuana, a Schedule I controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

### **COUNT FIVE**

On or about May 15, 2019, in the Western District of Missouri, defendant, Jimmy J. Lars Jr., did knowingly possess a firearm, to wit: a HI-POINT FIREARMS Model JHP .45 ACP handgun, bearing Serial Number X4317105, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, knowingly and intentionally

possessing with intent to distribute Marihuana, a Schedule I controlled substance, as charged in Count Four. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT SIX**

On or about May 15, 2019, in the Western District of Missouri, the defendant, Jimmy J. Lars Jr., knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a HI-POINT FIREARMS Model JHP .45 ACP handgun, bearing Serial Number X4317105, and the firearm was in and affecting commerce. All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

A TRUE BILL.

/s/ Harry Dixon

FOREPERSON OF THE GRAND JURY

Dated: 11/12/19  
Kansas City, Missouri

/s/ Caleb J. Aponte  
Caleb J. Aponte  
Special Assistant United States Attorney  
Western District of Missouri